

June 2, 2000

MEMORANDUM

TO: Audrey Cole, Pocatello Regional Administrator
Division of Environmental Quality

FROM: Dan Pitman, P.E., Staff Engineer
Civil/Environmental Engineering

SUBJECT: ***TIER II PERMIT AMENDMENT ANALYSIS***
T2-000003 Lamb Weston, American Falls
(Potato Processor)

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 16.01.01.400 (*Rules for the Control of Air Pollution in Idaho*) for issuing Tier II Operating Permits (PTC).

PROJECT DESCRIPTION

Lamb Weston, Incorporated has been issued a Tier II Operating Permit for its American Falls facility. The permit was issued December 27, 1995. On August 18, 1999, the Department of Environmental Quality (DEQ), Enforcement Group's Becky Goehring conducted an inspection of Lamb Weston's operations. During that inspection several potential compliance issues were raised.

In response to the compliance issues, Lamb Weston has requested to amend their permit. Lamb Weston's request does not include modifying emission limitations. The amendment request is purely administrative and does not affect the facility's emissions in any way.

The proposed permitting action is not an attempt to reissue an updated operating permit which accounts for all changes that have occurred at the facility since the issuance of the original December 27, 1995 Operating Permit. Rather, the purpose of this permitting action is solely to change certain existing permit conditions to address alleged permit violations.

SUMMARY OF EVENTS

December 27, 1995 - Lamb Weston was issued a Tier II Operating Permit.

February 23, 1996 - Amendment issued to Tier II Operating Permit. Changed facility contact persons name and removed BTU value from permit.

August 22, 1997 - Co-products line modification exempted.

March 7, 1997 - Flake drum replacement exemption.

February 7, 2000 - DEQ received Lamb Weston's request to make administrative amendments to their Tier II Operating Permit to change limits from input to output and to add the dryers increased throughput that was allowed through the March 7, 1997 Flake drum replacement exemption (~ 3 T/hr product input increase).

DISCUSSION

1. Amendment Description

Lamb Weston has requested to amend the General Operating Requirement throughput restrictions from hourly limits to daily limits. Additionally, a request was made to monitor produced product rather than input into the process.

The throughput limits of the operating permit dated December 27, 1995 have been amended to reflect the actual throughput increase that was achieved at the source due to the replacement of the flake drum dryers at the plant. Replacement of the flake drum dryers increased the plants capacity from an input of 61 tons per hour to an input of 64 tons per hour. This replacement was determined in writing by DEQ to be exempt March 7, 1997. Even though the facility had an operating permit for the old equipment that limited throughput to 61 tons per hour, it could legally operate the new equipment at up to 64 tons per hour. The appendix summarizes the changes to the permit.

In granting the sources request to limit produced product rather than input to the process, 64 tons per hour input was used as the basis to determine the corresponding daily production limits.

Lamb Weston has requested to allow the Duncan wet scrubber to be operated above the manufacturer's maximum recommended scrubbing media flowrate.

Lamb Weston has requested to clarify that the Kice Filter does not have operating pressure drop specifications for the filter's application at their American Falls facility.

Lamb Weston has requested to be allowed to operate the Pneumafil Air Filter outside of manufacturer recommend pressure drop requirements and to be required to operate the filter in accordance with a written operating and maintenance manual.

2. Equipment Listing

No equipment was described in the application as being changed or modified. Therefore, previous technical memorandums which describe equipment are still current.

3. Emission Estimates

Emissions are not proposed to be changed, nor are emissions expected to change from the purely administrative amendments which were requested. Therefore, no emission estimates were necessary to determine compliance with all applicable rules and regulations.

4. Modeling

As with emission estimates, modeling was not conducted as part of this permit amendment. Amendments which were requested are purely administrative and do not affect the

dispersion characteristics of any of the emission units. Modeling results from issuance of previous operating permits and exemptions were not reanalyzed. The purpose of this permitting action was solely to change certain existing permit conditions to address alleged permit violations.

5. Facility Classification

This facility is not a major facility as defined in IDAPA 16.01.01.006.54 and IDAPA 16.01.01.008.14. The facility is not a designated facility as defined in IDAPA 16.01.01.006.25. The facility classification is A2 because potential emissions without restrictions are more than one hundred tons per year (100 T/yr) and are less than 100 tons per year under the provisions of the permit. The SIC code for this facility is 2037.

6. Area Classification

The proposed facility will be located in Power County. This area is designated as attainment or unclassifiable for all criteria air pollutants.

7. Regulatory Review

None of the applicable regulatory requirements are affected by the proposed administrative changes.

8. Emission Limits

Emission limits do not change.

9. Operating Requirements

9.1 Lamb Weston has requested to amend the General Operating Requirement throughput restrictions from hourly limits to daily limits. Additionally, a request was made to monitor produced product rather than input into the process. The permit has been amended as follows:

9.1.1 Flake drum dryers #1 and #2 shall have a total maximum output of 38 tons per day (T/day), or 9,120 tons per year (T/yr).

9.1.2 Line fryers #1 and #2 shall have a total maximum output of 931 tons per day (T/day), or 223,440 tons per year (T/yr).

Changing limits from hourly to daily is consistent with the analysis which was performed in issuing the original permit. It is important to note that limiting the output of the line fryers inherently limits input to the line #1 and #2 drum dryers.

9.1.3 Lamb Weston has requested to allow the Duncan wet scrubber to be operated above the manufacturers maximum recommended scrubbing

media flowrate. Section 3.1.2 of both the *Line 1 Fryer* Permit Section and the *Line 2 Fryer* Permit Section have been amended as follows:

3.1.2 The scrubbing media flowrate to the Duncan wet scrubber shall be maintained within manufacturer's specifications with the exception that the manufacturer's recommended maximum scrubbing media flowrate may be exceeded.

Increasing the allowable scrubbing media flowrate increases scrubber efficiency.

9.1.4 Lamb Weston has requested to clarify that the Kice Filter does not have operating pressure drop specifications for the filter's application at their American Falls facility.

Lamb Weston has requested to be allowed to operate the Pneumafil Air Filter outside of manufacturer recommend pressure drop requirements and to be required to operate the filter in accordance with a written operating and maintenance manual.

To accommodate this, Section 3.1 and 3.2 of the *Dehydrated (flake) Product Line, Drum Dryers 1&2* Section of the permit have been removed and replaced with the following:

3.1 Kice and Pneumafil Filters

3.1.1 The Kice and Pneumafil Filters shall at all times be maintained in good working order and shall be operated as efficiently as practical.

3.1.2 The permittee shall develop for the Kice and Pneumafil Filters an operations and maintenance manual which will be followed to demonstrate that the filters are operated as efficiently as practical. The manuals shall include operating pressure drop requirements.

Discussions with inspectors whom have seen this equipment in operation believe this to be an acceptable change in permit conditions.

10. Monitoring and Recordkeeping Requirements

None of the monitoring or recordkeeping requirements are affected by these amendments.

11. AIRS Information

No modifications of equipment are proposed so the AIRS information data sheets do not need to be filled out.

FEES

The Lamb Weston, American Falls facility is not a major facility as defined in IDAPA 16.01.01.008.10. Therefore, registration fees are not applicable in accordance with IDAPA 16.01.01.527.

RECOMMENDATIONS

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that Lamb Weston be issued an amended Tier II Operation Permit for their facility in American Falls. No public comment period is required because emissions do not change (IDAPA 16.01.01.404.04).

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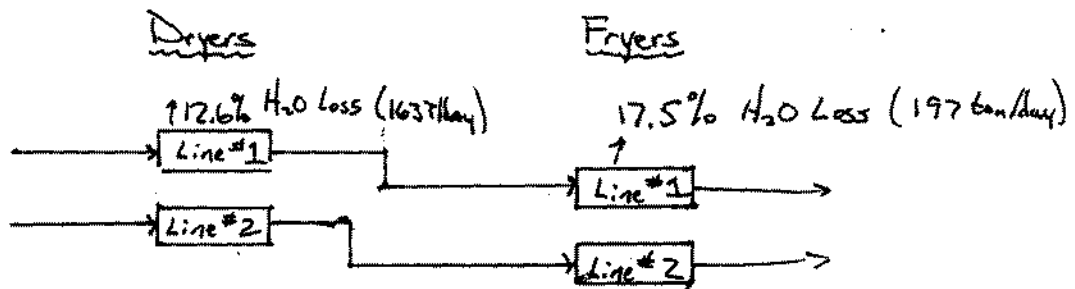
cc: DEQ State Office
Pocatello Regional Office

22-141 50 SHEETS
22-142 100 SHEETS
22-144 200 SHEETS



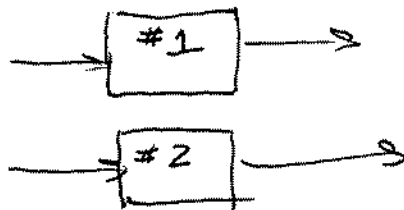
Appendix

Mass Balance Through Dryers & Fryers



<u>input</u>	<u>Dryer out / Fryer in</u>	<u>Product / output</u>
53.8 ton/hr 1,291.2 ton/day 309,181 ton/yr	47 ton/hr 1,128 ton/day 270,836 ton/yr	38.8 ton/hr 931 ton/day * 223,440 ton/yr *

Flake Drum Dryers



<u>input</u>	<u>Output</u>
9.38 ton/hr 225.12 ton/day 53,647 ton/yr	1.58 ton/hr 38 ton/day 38 ton/day * 9,120 ton/yr *

Total Dryer Input (Proposed Permit)
(Flake Drum #1 & 2, & Line #1 & Line #2)

63.18 ton/hr
1,516.3 ton/day
363,528 ton/yr

12/27/97 OP limit

61 ton/hr
351,360 ton/yr

* new permit limits